

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
BROOKLYN OFFICE  
FEB 29 2024  
ED TEAM

Gould, et al

Write the full name of each plaintiff or petitioner.

Case No. 1:24 CV 01263

-against-

NOTICE OF MOTION

City of New York

Write the full name of each defendant or respondent.

PLEASE TAKE NOTICE that plaintiff Carolette Meadows  
plaintiff or defendant name of party who is making the motion

requests that the Court:  
enjoin case 1:23cv00920 LJV to 1:24cv01263

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☐ a memorandum of law  
☒ my own declaration, affirmation, or affidavit  
☐ the following additional documents:

Dated

Name

Address

Telephone Number (if available)

Signature

Prison Identification # (if incarcerated)

City

State

Zip Code

E-mail Address (if available)

Revised 05/01 WDNV

### AFFIRMATION OF SERVICE

(If you are not having your signature notarized, use this form)

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
EASTERN

2024 FEB 29 PM 12:43

Carolette Meadows

Plaintiff(s),

v.

Erie County Dept. of Social Services, et al

Defendant(s).

### AFFIRMATION OF SERVICE

1:23 -CV-00920

1:24 CV 01263

I, (print your name) Carolette Meadows, served a copy of the attached papers  
(state the name of your papers) joinder MOTION & AFFIRMATION  
Erie County Law Dept - Rath Bldg for BOTH EASTERN  
Erie County Dept of Soc Services Law - Rath Bldg & WESTERN COURT

upon all other parties in this case  
by mailing ☐ by hand-delivering ☒ (check the method you used)

these documents to the following persons (list the names and addresses of the people you served)  
NYSAG - Main PI Towers R. STANTON 1230 KAREN DAVIS 1240  
Erie County Law Dept - Rath Bldg R. STANTON 1230  
Erie County Dept of Soc Serv - Rath Bldg

RECEIVED  
FEB 29 2024

on (date service was made) 02/29/2024

ERIE COUNTY  
DEPARTMENT OF LAW

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information and belief.

Executed on 02/29/2024  
(date)

(your signature)

UNITED STATES DISTRICT COURT  
~~WESTERN~~ DISTRICT OF NEW YORK  
EASTERN

Gould, et al

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Case No. 1:24 CV 01263

-against-

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plaintiff or defendant name of party who is making the motion

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- ☐ a memorandum of law
- ☒ my own declaration, affirmation, or affidavit
- ☐ the following additional documents:

Dated

02/29/24

Signature

*Carolette Meadows*

Name

CAROLETTE MEADOWS

Prison Identification # (if incarcerated)

Address

281 PARKWAY

City

BELO, NY 14024

State

Zip Code

Telephone Number (if available)

716.548.2501

E-mail Address (if available)

Revised 05/01 WDNV

### AFFIRMATION OF SERVICE

(If you are not having your signature notarized, use this form)

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
EASTERN

2024 FEB 29 PM 12:43

Carolette Meadows

Plaintiff(s),

v.

Erie County Dept. of Social Services, et al

Defendant(s).

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1:23 -CV-00920

1:24 CV 01263

I, (print your name) Carolette Meadows, served a copy of the attached papers  
(state the name of your papers) joinder Motion & Affirmation  
Erie County Law Dept - Rath Bldg for BOTH Eastern  
Erie County Dept of Soc Services Law - Rath Bldg & Western Court

upon all other parties in this case  
by mailing ☐ by hand-delivering ☒ (check the method you used)

these documents to the following persons (list the names and addresses of the people you served)  
NYSAG - Main PI Towers R. STANTON 1230 KAREN DAVIS 1240  
Erie County Law Dept - Rath Bldg R. Stanton 1230  
Erie County Dept of Soc Serv - Rath Bldg

RECEIVED  
FEB 29 2024

on (date service was made) 02/29/2024

ERIE COUNTY  
DEPARTMENT OF LAW

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information and belief.

Executed on 02/29/2024  
(date)

(your signature)

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ FEB 29, 2024 ★

BROOKLYN OFFICE

Rec'd  
3/7/24  
S

Write the full name of each plaintiff or petitioner.

Carolette Meadows

-against-

Case No. 1:23cv 00920 LSV

Elie County Dept of Soc  
Services, et al

NOTICE OF MOTION

Write the full name of each defendant or respondent.

PLEASE TAKE NOTICE that

plaintiff or defendant

Carolette Meadows  
name of party who is making the motion

requests that the Court:

to join this ~~Docket~~ to class  
action DOCKET 1:24cv 01263 in the  
Eastern Dist Courts.

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

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- ☐ a memorandum of law  
☒ my own declaration, affirmation, or affidavit  
☐ the following additional documents:

Dated

Name

Address

Telephone Number (if available)

Signature

Prison Identification # (if incarcerated)

State

Zip Code

E-mail Address (if available)

US District Court  
Western District of NY

---

Carolette Meadows,

Plaintiff

Affirmation in Support  
of Motion to Joinder

v.

Case: 1:23-cv-00920-LJV

Erie County Dept of Soc Services, et al,

Defendants

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The Plaintiff, Carolette Meadows, respectfully requests this Court, in accordance with:  
FRCP 18, 19, 20 *see Tietz v. Blackner*, 157 F.R.D. 510, 512 (D. Utah 1994)  
Cole v. Collier, 2017 U.S. Dist. LEXIS 238249, \*9, 2017 WL 11713699,

Rule 24(a) - an individual has a right to intervene if he: "1. is given an unconditional right to intervene by federal statute; or 2. claims an interest relating to the property or transaction that is the subject of the action, and is so situated that disposing of the action may as a practical matter impair or impede the movant's ability to protect its interest, unless existing parties adequately represent that interest." Fed. R. Civ. P. 24(a). "has a claim or defense that shares with the main action a common question of law or fact." Fed. R. Civ. P. 24(b)(1)(B). it is proper to consider whether the movant will significantly [\*11] contribute to the full development of the underlying factual interests in the suit. United Gas Pipe Line Co., 732 F.2d at 472.

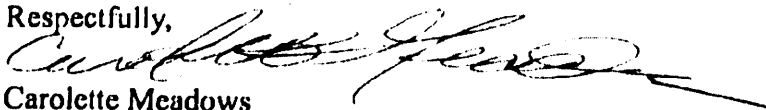
In this case the Plaintiff asserts that the claims are related since both family court agencies are under the governance of NYS Dept of Child and Family Services.  
and order allowing the Plaintiff to join docket 1:2024cv01263, if appropriate.

1:2024cv01263, being a class action, should allow the Plaintiff to join her claim with these claims since the subject matter of NYS CPS agencies' abuse and overreach of power are the core issue in both claims.

Plaintiff swears that the statements above are true and correct under penalty of perjury.

Respectfully,

Carolette Meadows



02/29/24

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

Write the full name of each plaintiff or petitioner.

CAROLLETTE Meadows  
-against-

Case No.

1:23cv 00920 LSV

Elie County Dept of Soc Services, et al

NOTICE OF MOTION

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PLEASE TAKE NOTICE that

CAROLLETTE Meadows  
plaintiff or defendant

name of party who is making the motion

requests that the Court:

DOCKET  
to join this ~~DOCKET~~ to class  
action DOCKET 1:24cv 01263 in the  
Eastern Dist Courts.

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☒ my own declaration, affirmation, or affidavit  
☐ the following additional documents:

Dated

02/29/2024

Signature

CAROLLETTE Meadows

Name

CAROLLETTE Meadows

Prison Identification # (if incarcerated)

Address

281 BARNARD ST

City

PSYCHIC

State

Zip Code

Telephone Number (if available)

716-848-0501

E-mail Address (if available)



US District Court  
Western District of NY

---

Carolette Meadows,

Plaintiff

Affirmation in Support  
of Motion to Joinder

v.

Case: 1:23-cv-00920-LJV

Erie County Dept of Soc Services, et al,

Defendants

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Carolette Meadows

02/29/24